

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Kim Tharesa Holt	:	Chapter 13
	:	Case No.: 19-12819-ELF
Debtor(s)	:	

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**SECOND MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Debtor, Kim Tharesa Holt, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on May 1, 2019.
2. The Chapter 13 Plan was confirmed on November 12, 2019.
3. On February 22, 2022, the Chapter 13 Trustee filed a Motion to Dismiss the case for the debtor's alleged failure to make and maintain timely monthly payments.
4. On June 14, 2022, an Order was entered Dismissing the Chapter 13 case and thereafter an Order was entered on July 20, 2022 vacating the same as the debtor submitted a substantial payment to the Trustee in good faith.
5. Debtor has paid \$11,010.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$377.00 per month for the remaining 21 months for a new base amount of \$18, 927.00.

7. The debtor is aware they must remain current on all ongoing obligations and payments due to the Chapter 13 Trustee in order to avoid any future attempts to dismiss the case.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the vacated Dismissal Order of the Chapter13 Trustee.

Dated: August 16, 2022

/s/Brad J. Sadek, Esq  
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